

Hearing Date: August 8, 2023 at 11:00 a.m. (ET)

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of Three Arrows Capital, Ltd.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:
Three Arrows Capital, Ltd.,
Debtor in a Foreign Proceeding

Chapter 15

Case No. 22-10920 (MG)

**DECLARATION OF TIFFANY M. IKEDA IN SUPPORT OF FOREIGN
REPRESENTATIVES OF THREE ARROWS CAPITAL, LTD.'S REPLY AND
OPPOSITION TO NON-PARTY KYLE DAVIES': (I) OPPOSITION TO MOTION FOR
CONTEMPT; AND (II) CROSS-MOTION TO VACATE ORDERS**

I, Tiffany M. Ikeda, pursuant to 28 U.S.C. Section 1746, hereby declare under penalty of perjury under the laws of the United States of America, as follows:

1. I am an attorney duly licensed to practice law in the State of California and admitted *pro hac vice* in the State of New York. I am an Associate at Latham & Watkins LLP ("Latham") and counsel for the Russell Crumpler and Christopher Farmer, in their joint capacities as the duly authorized foreign representatives (the "Foreign Representatives") of Three Arrows Capital, Ltd. ("Three Arrows" or the "Debtor") in the above-captioned matter.

2. I submit this declaration in support of the *Foreign Representatives of Three Arrows Capital, Ltd.’s Reply and Opposition to Non-Party Kyle Davies’*: (I) *Opposition to Motion for Contempt*; and (II) *Cross-Motion to Vacate Orders* filed contemporaneously herewith (the “Reply”).¹

3. Except as otherwise indicated, the facts set forth in this declaration are based upon my personal knowledge, my review of relevant documents, or my opinion based upon experience, knowledge, and information concerning the Debtor. I am authorized to submit this declaration on behalf of the Debtor, and if called upon to testify, I could and would testify competently to the facts set forth herein. As the counsel for the Foreign Representatives, I am familiar with the files in this case.

4. On June 14, 2023, the Foreign Representatives filed their *Motion for an Order (I) Holding Kyle Livingstone Davies to be in Civil Contempt for Failure to Comply with March 30, 2023 Court Order; and (II) Granting Sanctions Against Kyle Livingstone Davies* (the “Motion for Contempt”). [Dkt. 98.] On the same date, the Foreign Representatives filed supporting declarations from Russell Crumpler, Nima H. Mohebbi, Alex M. Englander, and me, and a notice of hearing (together with the Motion for Contempt, the “Motion for Contempt Papers”). [Dkt. Nos. 99-103.]

5. On June 15, 2023, my colleague Christopher Tarrant (“Mr. Tarrant”) served a copies of the Motion for Contempt Papers on Mr. Davies via email, in accordance with the Court’s December 29, 2022 Order authorizing alternative service on Mr. Davies by email and Twitter (the “Service Order”). Mr. Tarrant subsequently provided a copy of this email to me.

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

6. Attached hereto as Exhibit A is a true and correct redacted copy of the June 15, 2023 email to Mr. Davies, attaching the Motion for Contempt Papers.

7. I understand the Foreign Representatives also served the Motion for Contempt Papers by Twitter in accordance with the Service Order. I personally viewed the June 15, 2023 tweets that were posted through the Foreign Representatives' Twitter account.

8. Attached hereto as Exhibit B is a true and correct copy of excerpts from the Foreign Representatives' June 15, 2023 tweets to Mr. Davies, attaching the redacted copies of Motion for Contempt Papers.

9. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: August 4, 2023

/s/ Tiffany M. Ikeda
Tiffany M. Ikeda